

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Chapter 11 V
Industrial Food Truck, LLC

(DEBTOR) Bankruptcy No. 20-13275AMC 11V

**MOTION TO EXPEDITE HEARING UPON DEBTOR'S MOTION TO EXTEND TIME TO FILE
A CHAPTER 11 V PLAN.**

1. Debtor's plan is due November 5, 2020.
2. This is the initial deadline with no prior application or extension
3. The attached motion for an extension was filed October 22, 2020.
Exhibit A.
4. Debtor requests an expedited hearing to consider the merits of the motion seeking an extension of time to file the plan and requires a hearing date before the expiration of the November 5, 2020 date.
5. The Code provides as follows;

11USC 1189 (b)Deadline.
" The debtor shall file a plan no later than 90 days after the order for relief under this chapter, except that the court may extend the period if the need for the extension is attributable to circumstances for which the debtor should not justly be held accountable."
6. A key component of a plan involves projections and the ability to formulate fair and equitable treatment of creditors.
7. The Pandemic which forced the business to close for 5 months still exists and the business is taking time to stabilize.
8. Since filing the debtor has been hampered in operations as the City due to backlog and perhaps staffing during the pandemic just inspected and issued his license on October 10, 2020. Exhibit B.
9. This affected the debtor's ability to operate and obtain new commissary clients.
10. November would be the first full month of operation of the

commissary.

11. Debtor needs the November figures and adjusted projections in order to finalize a fair and equitable plan for creditors.

WHEREFORE, Debtor prays that this Honorable Court enter an order scheduling an expedited hearing upon the debtor's motion to extend deadline to file a plan.

Cibik & Cataldo, PC

Date: October 26, 2020

BY: /s/ Michael A. Cataldo
MICHAEL A. CATALDO, ESQUIRE
Cibik & Cataldo, P.C.
1500 Walnut Street, Suite 900
Philadelphia, PA 19102
215-735-1060/fax 215-735-6769

Proposed Counsel for the Debtor